

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MEAGHAN CIOTTI,

ANSWER

Plaintiff,

-against-

Docket No.: 23-cv-10279 (ER)

CITY OF NEW YORK and
JAMIE ANGELASTRO

JURY TRIAL DEMANDED

Defendants.
-----X

Defendant JAMIE ANGELASTRO, hereby answers Plaintiff's Amended Complaint as follows:

1. Deny the allegations contained in paragraph 1.
2. Deny the allegations contained in paragraph 2.
3. Deny the allegations contained in paragraph 3.

PARTIES

4. Admit the allegations contained in paragraph 3, except deny knowledge and information sufficient to form a belief as to whether the NYPD still employs Plaintiff.
5. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 5.
6. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 6 except admit NYPD employed him until June 7th, 2024.

JURISDICTION AND VENUE

7. Admit the allegations contained in paragraph 7.
8. Admit the allegations contained in paragraph 8.
9. Admit the allegations contained in paragraph 9.

10. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 10.
11. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 11.

FACTS

12. Admit the allegations contained in paragraph 12.
13. Deny the allegations contained in paragraph 13.
14. Deny the allegations contained in paragraph 14.
15. Admit the allegations contained in paragraph 15.
16. Deny the allegations contained in paragraph 16.
17. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 17, except admit she was a New York City Police Officer.
18. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 18.
19. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 19.
20. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 20.
21. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 21.
22. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 22.
23. Deny the allegations contained in paragraph 23.

24. Deny the allegations contained in paragraph 24, except admit there was a meeting that Plaintiff herself asked for and admit that Defendant Angelastro knew a lot of people and believes he was generally well-liked.
25. Deny the allegations contained in paragraph 25.
26. Deny the allegations contained in paragraph 26.
27. Deny the allegations contained in paragraph 27.
28. Deny the allegations contained in paragraph 28.
29. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 29, except admit they discussed trying to work through her issues with the farm without the need for her to resign.
30. Deny the allegations contained in paragraph 30.
31. Deny the allegations contained in paragraph 31.
32. Deny the allegations contained in paragraph 32.
33. Deny the allegations contained in paragraph 33.
34. Deny the allegations contained in paragraph 34.
35. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 35.
36. Deny the allegations contained in paragraph 36.
37. Deny the allegations contained in paragraph 37.
38. Deny the allegations contained in paragraph 38.
39. Deny the allegations contained in paragraph 39.
40. Deny the allegations contained in paragraph 40.
41. Deny the allegations contained in paragraph 41.

42. Deny the allegations contained in paragraph 42.
43. Deny the allegations contained in paragraph 43.
44. Deny the allegations contained in paragraph 44.
45. Deny the allegations contained in paragraph 45.
46. Deny the allegations contained in paragraph 46.
47. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 47.
48. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 48, except admit that Plaintiff was put back on patrol at some point.
49. Deny the allegations contained in paragraph 49
50. Deny the allegations contained in paragraph 50.
51. Deny the allegations contained in paragraph 51.
52. Deny the allegations contained in paragraph 52.
53. Deny the allegations contained in paragraph 53.
54. Deny the allegations contained in paragraph 54.
55. Deny the allegations contained in paragraph 55.
56. Deny the allegations contained in paragraph 56.
57. Deny the allegations contained in paragraph 57.
58. Deny the allegations contained in paragraph 58.
59. Deny the allegations contained in paragraph 59.
60. Deny the allegations contained in paragraph 60.
61. Deny the allegations contained in paragraph 61.

62. Deny the allegations contained in paragraph 62, except admit that Plaintiff sent an email with untrue allegations.
63. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 63.
64. Deny the allegations contained in paragraph 64.
65. Deny the allegations contained in paragraph 65.
66. Deny the allegations contained in paragraph 66.
67. Deny the allegations contained in paragraph 67.
68. Deny the allegations contained in paragraph 68.
69. Deny the allegations contained in paragraph 69.
70. Deny the allegations contained in paragraph 70.
71. Deny the allegations contained in paragraph 71.
72. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 72.
73. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 73.
74. Deny the allegations contained in paragraph 74.
75. Deny the allegations contained in paragraph 75.
76. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 76, except admit that he was placed on modified assignment.
77. Admit the allegations contained in paragraph 77, except deny knowledge and information sufficient to form a belief as to the date it occurred.
78. Admit the allegations contained in paragraph 78.

79. Deny the allegations contained in paragraph 79.
80. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 80.
81. Deny the allegations contained in paragraph 81.
82. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 82 except deny that Plaintiff's claims of harassment, rape, assault, and stalking are true.
83. Deny the allegations contained in paragraph 83.
84. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 84, except admit there was an order of protection.
85. Deny the allegations contained in paragraph 85.
86. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 86.
87. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 87.
88. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 88.
89. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 89.
90. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 90.

91. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 91, except deny the content of Plaintiff's allegations against Defendant Angelastro.
92. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 92.
93. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 93.
94. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 94.
95. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 95, except admit they are friends.
96. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 96, except deny that Defendant Angelastro harassed Plaintiff.
97. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 97.
98. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 98.
99. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 99.
100. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 100.
101. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 101, except deny Plaintiff's allegations of sexual harassment.

102. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 102.
103. Deny the allegations contained in paragraph 103.
104. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 104.
105. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 105.
106. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 106.
107. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 107.
108. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 108.
109. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 109.
110. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 110.
111. Admit the allegations contained in paragraph 111, except deny knowledge of the date.
112. Deny the allegations contained in paragraph 112.
113. Deny the allegations contained in paragraph 113.
114. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 114.
115. Deny the allegations contained in paragraph 115.

116. Deny the allegations contained in paragraph 116.
117. Deny the allegations contained in paragraph 117.
118. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 118.
119. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 119.
120. Deny the allegations contained in paragraph 120.
121. Admit the allegations contained in paragraph 121, except deny knowledge and information sufficient to form a belief as to the phone call referenced.
122. Deny the allegations contained in paragraph 122.
123. Deny the allegations contained in paragraph 123.
124. Deny the allegations contained in paragraph 124.
125. Deny the allegations contained in paragraph 125.
126. Deny the allegations contained in paragraph 126.
127. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 127.
128. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 128.
129. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 129.
130. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 130.

131. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 131.
132. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 132, except admit that there was an incident in the Summer of 2021 where Plaintiff violated the Order of Protection that was taken out against her.
133. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 133, except admit that there was an incident in the Summer of 2021 where Plaintiff violated the Order of Protection that was taken out against her.
134. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 134, except admit that there was an incident in the Summer of 2021 where Plaintiff violated the Order of Protection that was taken out against her.
135. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 135, except admit that there was an incident in the Summer of 2021 where Plaintiff violated the Order of Protection that was taken out against her.
136. Deny the allegations contained in paragraph 136.
137. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 137.
138. Deny the allegations contained in paragraph 138.
139. Deny the allegations contained in paragraph 139.
140. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 140.
141. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 141.

142. Deny the allegations contained in paragraph 142.
143. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 143.
144. Deny the allegations contained in paragraph 144.
145. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 145.
146. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 146.
147. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 147.
148. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 148.
149. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 149.
150. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 150.
151. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 151.
152. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 152, except deny that Angelastro “behaved” in the way Plaintiff alleges.
153. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 153.

154. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 154.
155. Deny the allegations contained in paragraph 155.
156. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 156.
157. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 157.
158. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 158.
159. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 159.
160. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 160.
161. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 161.
162. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 162.
163. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 163.
164. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 164.
165. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 165.

166. Deny knowledge and information sufficient to form a belief as to the allegations contained in paragraph 166, but deny that Angelastro ever assaulted Plaintiff.
167. Deny the allegations contained in paragraph 167.
168. Deny the allegations contained in paragraph 168.

AFFIRMATIVE DEFENSES

AS FOR A FIRST AFFIRMATIVE DEFENSE

169. The Amended Complaint, in whole or in part, fails to state a claim upon which relief can be granted.

AS FOR A SECOND AFFIRMATIVE DEFENSE

170. Any and all physical contact between Plaintiff and Defendant was consensual. Defendant denies engaging in any conduct without Plaintiff's consent.

AS FOR A THIRD AFFIRMATIVE DEFENSE

171. At no time did Defendant act with malice, recklessness, or gender-based animus sufficient to support a claim under the New York City Gender-Motivated Violence Act.

AS FOR A FOURTH AFFIRMATIVE DEFENSE

172. To the extent any of Plaintiff's claims fall outside the scope of CPLR § 214-j (Adult Survivors Act) or are otherwise not revived, such claims are barred, in whole or in part, by the applicable statutes of limitations. Defendant expressly reserves the right to assert this defense as discovery progresses.

AS FOR A FIFTH AFFIRMATIVE DEFENSE

173. Plaintiff has failed to mitigate her alleged damages, if any, and her recovery, if any, must be reduced accordingly.

AS FOR A SIXTH AFFIRMATIVE DEFENSE

174. Some or all of Plaintiff's claims are duplicative or seek multiple recoveries for the same alleged conduct, and should be dismissed or merged to prevent double recovery.

AS FOR A SEVENTH AFFIRMATIVE DEFENSE

175. To the extent Plaintiff seeks equitable or statutory remedies, including but not limited to relief under the Gender-Motivated Violence Act or the Adult Survivors Act, such claims are barred in whole or in part by the doctrine of unclean hands. Plaintiff's conduct in connection with the events alleged—including any retaliatory, manipulative, or bad faith actions—precludes or limits recovery under principles of equity, fairness, and good conscience.

AS FOR AN EIGHTH AFFIRMATIVE DEFENSE

176. Defendant reserves the right to assert additional defenses as they become known through discovery and investigation.

Dated: New York, New York
April 28, 2025

Yours Truly,

_____/s/_____
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